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March 14, 2022

Hon. Gregory H. Woods
Hon. James L. Cott
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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MEMORANDUM ENDORSED

Re: *Contreras v. Maude Group, Inc.*, No. 1:22-cv-00067-GHW

Dear Judge Woods and Magistrate Judge Cott,

Pursuant to Federal Rule of Civil Procedure 6(b), Part 1(E) of Judge Woods' Individual Practices in Civil Cases, and Part I(E) of Magistrate Judge Cott's Individual Practices, Defendant Maude Group, Inc., by its undersigned counsel, respectfully requests (i) an adjournment of the due date for the Joint Letter and a Proposed Case Management Plan and the Initial Pretrial Conference to May 8, 2022 and May 15, 2022, respectively, or at other dates convenient for the Court; (ii) an adjournment of the date by which the Court-ordered mediation is to be completed to May 1, 2022, and (iii) a second extension of the time for Defendant to file its response to the Complaint to April 14, 2022.

In support of this Letter Motion, Defendants state the following:

1. In an Order entered on January 5, 2022 (Dkt. No. 5), this Court set the date for the parties to submit a Joint Letter and a Proposed Case Management Plan as April 8, 2022 and set the date for the Initial Pretrial Conference in this matter for April 15, 2022;
2. In the Mediation Referral Order (Dkt. No. 6), the Court referred this action for mediation under the Court-annexed Mediation program, and directed that such mediation to be completed no later than April 1, 2022;
3. The initial deadline for Defendant to answer, move or otherwise respond to the Complaint was February 22, 2022;
4. On March 7, 2022, this Court granted Defendant's first request for an extension of the time to file a response to the Complaint, and set Defendant's deadline to answer, move or otherwise respond to March 15, 2022. *See* Dkt. No. 10;

5. This is the first request to adjourn (i) the due date for the Joint Letter and a Proposed Case Management Plan, (ii) the date of the Initial Pretrial Conference, and (iii) the date by which the Court-ordered mediation is to be completed;
6. This is Defendant's second request for an extension of time to respond to the Complaint;
7. The requested extensions will not affect any other dates set in the case;
8. Plaintiff Yensy Contreras, through his counsel, consents to this each of the requests reflected herein;
9. Good cause exists for the extension as it will allow the Parties to continue to engage in discussions regarding the potential settlement of the dispute; and
10. The Parties agree that this request for an extension does not constitute a waiver of any claim, right or defense available to any Party.

Respectfully submitted,

/s/ Matthew Weiser

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Counsel for Defendant Maude Group, Inc.

Application granted. The deadline for defendant to answer or otherwise respond to the complaint is extended to April 14, 2022. The initial pretrial conference scheduled for April 15, 2022 is adjourned to May 17, 2022 at 4:30 p.m. The joint status letter and proposed case management plan described in the Court's January 5, 2022 order are due no later than May 10, 2022. The mediation should take place at least two weeks prior to the initial pretrial conference.

SO ORDERED.

Dated: March 14, 2022
New York, New York



GREGORY H. WOODS
United States District Judge